

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO on the)	
Relation of State Engineer,)	
)	
Plaintiff,)	69cv07941-BB-ACE
v.)	RIO CHAMA STREAM
)	SYSTEM
)	
RAMON ARAGON, et al.)	Section 7
)	Subfile: CHRU-004-0039
Defendants.)	

JOINT MOTION FOR STAY

COME NOW Hope Miner and Norm Vogt, Inc., and in accordance with Rule 7 of the Federal Rules of Civil Procedure, and Rule 7.2 of the Local Rules of the United States District Court for the District of New Mexico, move for a stay of the January 18, 2006 deadline to file any dispositive and limine motions and objections to exhibits applicable to Subfile CHRU-004-0039, and in support thereof state as follows:

1. On November 15, 2005, the Special Master issued an Order Amending Pretrial Order setting January 18, 2006 as the deadline to file any dispositive and limine motions, and the deadline to object to proposed exhibits in Subfile CHRU-004-0039.
2. Defendants Hope Miner and Norm Vogt, Inc. have entered into settlement discussions and believe that a settlement may be reached in this matter.
3. A two-month stay of the January 18, 2006 deadline is needed to facilitate settlement.

4. Edward G. Newville, attorney for the State of New Mexico, has been contacted regarding this Motion and he does concur.

WHEREFORE, Defendants Hope Miner and Norm Vogt, Inc. request that the Court order that the deadline for filing any dispositive and limine motions, and the deadline to object to proposed exhibits in Subfile CHRU-004-0039, be stayed until March 20, 2006.

Respectfully submitted,

LEWIS and ROCA JONTZ DAWE, LLP

Electronically Filed

By: _____

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and

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Telephonically Approved 1/9/06

By _____

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Attorneys for Norm Vogt, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to the following on this 10th day of January, 2006:

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